



Workforce Services Guidance – Outreach and Marketing

Effective Date: April 22, 2021

Duration: June 30, 2023

Purpose:

To provide information and guidance for the use of state and federal funds to conduct outreach and promote/market local workforce services. This guidance will further define 2 CFR Part 200 regarding the applicability and restriction of funds for outreach.

Scope:

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TDOE); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

I. Definitions

- A. **Program Outreach:** Program outreach is an activity conducted by workforce boards to educate the public about services available and how to access those services. Program outreach also includes activities designed to inform and recruit individuals that have particular needs and have been targeted for services. Federal regulations allow costs associated with advertising to conduct program outreach activities. Allowable advertising includes TV and radio spots, billboards, spots on transit media, signage, social media, websites, brochures, etc. Program outreach should be a coordinated activity that support and benefits the various workforce grants operated by the local workforce development boards.

Allowable advertising should be targeted to businesses, job seekers and/or community partners and: 1) connects job seekers, businesses, and/or community partners to programs and services offered by the LWDB, and 2) serves a business purpose by assisting job seekers obtain employment and employers find qualified job seekers. All advertising for program outreach must include the organization's name, a tag line that promotes services, and contact information (such as a web site or telephone number).

- B. **Outreach/Informational Item:** An outreach/informational item is something purchased for distribution to job seekers and employers as a way to reinforce the program outreach advertising that a LWDB does.
- C. **Promotional/Marketing Item:** An item purchased for distribution to the general public that promotes the organization (only contains the name of the LWDB).

- D. **Connection to Programs/Services:** A statement that connects a business, partner or job seeker to services offered at the workforce board. For example, "Call [phone #] or visit [website] for assistance in locating employment or job training".

II. Applicability

The allowable and unallowable purchases section contained in this guidance apply to the use of federal funding received from TDLWD. It does not apply to outreach/informational and promotional/marketing items purchased with non-federal and non-restrictive funds.

This guidance does not apply to the following items that are not considered "outreach/informational." These items may include the name and/or the logo of the organization and tag line, so long as the cost of adding that information is not significantly different from the cost of the supplies unmarked, and those supplies are used only for the conduct of grant business and not as outreach/informational purposes. The LWDB should maintain cost comparison data between the items marked and unmarked to demonstrate that the cost variance was reasonable. These items include:

- Office supplies such as pens, pencils, pads of paper, business cards, stationary, post-it note pads, mouse pads, lanyards, or similar items used by either staff, board members, or individuals participating in workforce program activities.
- Balloons, banners, and table skirts that include the organization's name used to identify the organization at events such as job fairs and other community events.
- T-shirts and other type uniform materials worn by staff or participants used to identify staff and participants as members of the local workforce team.
- Supportive services such as grooming supplies (pocket valets) and other similar items that may be used to help participants successfully interview for jobs, etc.
- Supplies, materials, booklets, and videos purchased for resource rooms, job readiness classes, and Rapid Response.

III. Allowable and Unallowable Purchases

The purchase of outreach/informational items to conduct program outreach to inform employers and job seekers of the availability of services through local workforce development boards is an allowable use of funds as an advertising cost when it meets the requirements of this guidance. In order to be allowable, program outreach/informational items must meet the following criteria:

- Provide contact information regarding the LWDB. The minimum information would be the LWDB name, website and/or phone number, and/or other information that would direct the user to the LWDB for services.
- Include a statement that connects a business, partner or job seeker to services offered at the workforce board. For example, "Call [phone #] or visit [website] for assistance in locating employment or job training," etc.
- Be reasonable in price and necessary to assist in outreach to businesses, community partners and job seekers. Only the number of items determined necessary to support outreach efforts planned for the program year should be purchased.
- Outreach items provided to businesses/community partners should be items that can be used in the work environment and have the added benefit/value of connecting the business/community

partner to the programs and services provided by the Local Workforce Development Board.

- Outreach items provided to job seekers should be useful during the search for employment, while connecting the individual back to employment programs and services.

The following is a non-exhaustive list of allowable outreach/informational items, provided that the items meet the criteria outlined above within section VI:

- Portfolios/folders purchased for distribution to job seekers to assist them in seeking employment. These items should include information on available workforce services (brochures, pamphlets, etc.).
- Pens and pencils purchased for distribution to job seekers and participants to assist them in seeking jobs and participating in program services and/or for distribution to businesses and community partners to remind them of services available through the Local Workforce Development Board.
- USB drives that include pre-loaded information about available services purchased for distribution to job seekers and participants to assist them in seeking jobs and participating in program services and/or for distribution to businesses and community partners to remind them of services available through the Local Workforce Development Board.
- Tote bags for distribution to job seekers at job fairs and community events. Tote bags and other similar item purchased for distribution to job seekers should include information on available workforce services (brochures, pamphlets, etc.).

Additional items not on this list of allowable items may be approved on a case-by-case basis in very limited, unique situations with prior written approval from TDLWD.

Items purchased for distribution to the general public that promote the organization (only contains the name of the Local Workforce Development Board) are promotional/marketing items and are not allowed. The following are examples of items that **are not allowed** to be purchased from federal grant resources:

- Balloons purchased for distribution to the general public at job fairs or community events. These and other promotional/marketing items intended to be distributed to the general public as a “giveaway” are not allowable.
- Hairbrushes/other personal items purchased for distribution as a marketing item to the general public or job seekers. These and other promotional/marketing items intended to be distributed to the general public as a “giveaway” are not allowable.
- Umbrellas purchased for distribution to businesses and community partners to engage and remind them of services available through the LWDB. Although the item may be intended for distribution to only businesses targeted for recruitment, the item is determined to have limited value/benefit and has a high cost per item for that limited benefit.

All materials purchased for outreach must include the tag line “A proud partner of the AJC Network”.

IV. Marketing to Opportunity Zones

WIOA emphasizes a priority of service to individuals who are in most in need to include low-income individuals¹. Marketing efforts for WIOA Title I funding should focus on those same populations that need to be served by targeting Opportunity Zones. Information on the location of opportunity zones

¹ TEGL 7-20

and ongoing projects within these zones can be located at: <https://www.tn.gov/ecd/opportunity-zones.html>.

V. Funding Allowability

Generally, USDOL Employment and Training Administration programs like the Workforce Innovation and Opportunity Act and Wagner-Peyser Act allow for the purchase of outreach and informational materials. Other programs depend on grantor preference on the issue or the nature of the services provided. Because many grants are limited, uses of cost pools should be avoided. A matrix of the workforce funding sources and whether the grant allows these types of purchases is included in **Attachment I**. The “Outreach/Informational Items Decision Tree” in **Attachment II** is provided as a resource tool in determining funding allowability. Outreach/informational items purchased for distribution will be subject to audit and are allowable only under limited circumstances. LWDBs are encouraged to first find nonfederal/non-state resources to pay for such items or seek donations for these items by community partners.

VI. Prior Written Approval

Prior written approval is required for any purchase of allowable outreach/informational item listed within section III exceeding \$5,000 in total for the program year. No procurement shall be artificially divided or split in order to fall within the prescribed threshold. Prior written approval is also required for any purchases of other allowable outreach/informational items not specifically included in the list of allowable items within section III, regardless of total cost. Items not on the list of allowable items may be approved on a case-by-case basis in very limited, unique situations. The specific purchase, exact message to be included on the items, the intended recipients of the items, and specific funding sources with supporting justification, must be sent to Workforce.Board@tn.gov. An LWDB must note the anticipated volume of items and timeframe within which the items will be distributed. If in any doubt of items to be purchased, contact WFS prior to making assumptions regarding the purchase of said potential marketing material.

VII. Documentation & Performance

LWDBs must have good, clear supporting documentation for all costs associated with program outreach and informational activities. Good, clear supporting documentation establishes that the expenditure:

- meets the cost principles (is necessary and reasonable for proper and efficient performance and administration of the grant);
- is allocable to the grant based upon benefits received;
- is authorized or not prohibited under federal, state or local laws or regulations;
- conforms to any limitations or exclusions set forth in the principles, federal laws, terms and conditions of the federal award, or other governing regulations as to types or amounts of cost items; and
- is consistent with policies, regulations, and procedures that apply.

Along with having documentation for marketing efforts, the LWDBs should be able to demonstrate the performance metrics associated with the marketing efforts. The money spent to market WIOA services should be tied back to performance to show the effectiveness spending funding on marketing.

Attachments:

Attachment I - Grant Allowability Matrix

Attachment II – Outreach/Informational Items Decision Tree

References:

Workforce Innovation and Opportunity Act (WIOA; 29 U.S.C. 2701 et seq.); Regulations for the Workforce Development Systems Under Title I of WIOA (20 C.F.R. Part 675 et seq.); Wagner-Peyser Act (29 U.S.C. 49 et seq.); Regulations for the Wagner-Peyser Act Employment Service (20 C.F.R. Part 651 et seq.); Title 2 C.F.R. Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the Uniform Guidance).

Contact:

For any questions related to this policy, please contact the Program Integrity Unit at Workforce.Board@tn.gov.


.. (Apr 22, 2021 12:20 CDT)

James Roberson, Workforce Services Interim Assistant Commissioner

Attachment I
Grant Allowability for Purchases of Outreach/Informational Items

Program Title	Allowable to Purchase Informational Items?
Supplemental Nutrition Assistance Program	No
Wagner-Peyser Employment Services	Yes
Unemployment Insurance (UI)	No
Reemployment and Eligibility Assessments	No
Trade Adjustment Assistance	No
WIOA Formula awards (Adult, Dislocated Worker and Youth)	Yes
WIOA State Level	Note 1
Disabled Veterans' Outreach Program (DVOP)	No
Local Veterans' Employment Representative Program (LVER)	No
Veteran's Incentive Awards	Yes, Note 2
Other grant awards	Note 3

Notes:

- (1) Allowable, unless restricted due to special terms in the Notice of Funds Availability (NFA).
- (2) Veteran's Incentive Awards are unrestricted funding that are not subject to prior approval requirements.
- (3) Depends on the specific grant requirements. Contact the Grant Manager listed on the NFA with any questions.

Attachment II Outreach/Informational Items Decision Tree

